

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Catharine Reed Hand,	:	Bankruptcy Case No.: 16-22949-CMB
	:	
Debtor.	:	Chapter 13
	:	
Catharine Reed Hand,	:	
	:	Document No.: 138
Movant,	:	
	:	Related to Document No.:
v.	:	
	:	
Freedom Mortgage Corporation,	:	
	:	
Respondent.	:	

**DEBTOR'S DECLARATION OF SUFFICIENT PLAN FUNDING**

Pursuant with the Notice of Mortgage Payment Change filed on November 2, 2021, after reasonable investigation and upon review of the existing Chapter 13 Plan, it appears to Debtor that the existing payment is sufficient to fund the plan even with the proposed change for December 1, 2021.

The new post-petition monthly payment payable to Respondent is \$911.46, effective December 1, 2021, per the notice dated November 2, 2021. The Debtor's plan payment provides for a monthly payment to Freedom Mortgage Corporation of \$992.64. Therefore, Debtor's plan remains sufficient.

Respectfully Submitted,

Date: November 12, 2021

/s/Brian C. Thompson  
Brian C. Thompson, Esquire  
Attorney for Debtor  
PA I.D. # 91197  
Thompson Law Group, P.C.  
125 Warrendale-Bayne Road, Suite 200  
(724) 799-8404 Telephone  
(724) 799-8409 Facsimile  
[bthompson@thompsonattorney.com](mailto:bthompson@thompsonattorney.com)